

The draft Chigwell Neighbourhood Plan fails to meet the specified “basic condition” of D - that the Neighbourhood plan contributes to the achievement of sustainable development.

Comments and proposed modifications

- i. The draft NP is clear that one of its main objectives is to manage new growth to minimise additional effects on the existing congested local road network. Sites such as Rolls Park that are remote from existing services and facilities have been selected but no evidence is supplied that new residents will either use the new bus service or those using private vehicles will not add to pressure in congested areas.
- ii. The draft NP fails to give priority or indeed any consideration to pedestrian and cycle movements, either in proposed new developments or as part of existing infrastructure, and how these could be improved.
- iii. The issue of air quality has not been addressed in the draft NP and does not appear to be a priority of CPC, despite the HRA screening assessment identifying air quality in Epping Forest SAC as a primary issue to be considered at plan level.
- iv. The draft NP relies on the proposed new bus service to justify remote site selections. Doubts have been raised, both by Epping Forest and local residents, as to the viability and legality of this service. No acceptable or independently validated evidence has been provided by CPC that the bus service is financially viable in the long term.

Unfortunately, given point iii above, the purchase of electric rather than diesel powered buses appears not to have been considered and thus, their continued operation in the face of falling emissions standards may not be guaranteed. Budgets for the bus service make no reference to the maintenance and upgrading that may be necessary to ensure the diesel powered buses continue to meet emissions standards or capital purchase for replacements if they do not.
- v. The proposed Rolls Park development (and Gravel Lane in the Local Plan) are unsustainable in terms of transport and, as pieces of strategic Green Belt, currently of high value in preventing sprawl.
- vi. The proposed development of the Victory Hall site, being directly adjacent to Green Belt Land, has the potential to impact on the openness of the Green Belt and, as such, any development there should take into account.

According to the pre-submission, much of the proposed neighbourhood plan seeks to allocate land for future development. However, whilst stating the sites are in line with the Local Plan, there is a lack of clear location (other than Rolls Park) and analysis of the viability of specific sites within the NP. This is of concern as it does not provide easily accessible or understandable evidence that will engage local residents during the consultation period.

Given that so much proposed development in the draft NP appears dependent on the bus service and vice versa, it is unfortunate that so little in the way of planning, risk assessment, viability assessment and general responsible management of the project has been done. Two buses have been purchased in a process that failed to comply with the Public Contracts Directive. The decision to exclude members of the public from council meetings where the Hub and bus service were discussed has elevated the risk of these being considered as being driven by a section of the Council that appear unqualified and unsuitable to be in charge of such significant projects. The independent auditor of CPC considered that a project management system should be put in place but this has not been done to date, despite press statements being made by a Councillor that the bus service will start in September 2018.

As an alternative to the transport infrastructure developments currently proposed in the local plan, development and improvement of the area's cycle and foot paths should be considered. Safe routes to cycle highways, a safe cycle route replacing the proposed bus route and the provision of safe cycle storage at the stations, schools, shops and new developments in the area would provide viable sustainable transport options whilst reducing traffic movement with the added benefit of improving the health of participants.

A new safe cycle route from Chigwell to link up with the cycle routes of the canals, the River Lea and Olympic developments and thus into the city and beyond to Canary Wharf or the West End would provide many Chigwell based London workers the opportunity to have a safe and healthy journey to and from work. Secure bike parking at the station and local shops would reduce the need for car parking and cut the number of private car journeys.

Increased pedestrianisation of shopping, residential and school areas, encouraging electric car usage with charging points, leading the way with electric council vehicles and improving facilities in favour of pedestrians and cycles could be considered as an alternative to providing facilities for more cars and diesel buses.